

Exhibit A

Rule 2016 Statement

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AMYRIS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-11131 (TMH)

(Jointly Administered)

**STATEMENT UNDER RULE 2016 OF THE FEDERAL RULES OF
BANKRUPTCY PROCEDURE AND SECTION 329 OF THE BANKRUPTCY CODE**

Gordon Rees Scully Mansukhani, LLP (“Gordon Rees”), pursuant to Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and section 329(a) of title 11 of the United States Code (the “Bankruptcy Code”), hereby makes this statement in support of the *Debtors’ Application for Entry of an Order (A) Authorizing the Employment and Retention of Gordon Rees Scully Mansukhani, LLP as Special Counsel Effective as of October 21, 2023 and (B) Granting Related Relief* (the “Application”).²

1. Compensation agreed to be paid by the Debtors to Gordon Rees is for legal services to be rendered in connection with these Chapter 11 Cases. The Debtors have agreed to pay Gordon Rees for the legal services rendered or to be rendered by its various attorneys, paralegals, and case management assistants in connection with these Chapter 11 Cases on the Debtors’ behalf. The Debtors have agreed to reimburse Gordon Rees for its actual and necessary expenses incurred in connection with these Chapter 11 Cases.

¹ A complete list of each of the Debtors in these Chapter 11 Cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.stretto.com/Amyris>. The location of Debtor Amyris Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 5885 Hollis Street, Suite 100, Emeryville, CA 94608.

² All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.

2. Gordon Rees was listed as an ordinary course professional in the Debtors' *Motion for Entry of Order: (I) Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business; and (II) Granting Related Relief* [Docket No. 137] (the "OCP Motion"). On September 13, 2023, the Court entered an Order granting the OCP Motion [Docket No. 260] (the "OCP Order"). Gordon Rees was listed in the OCP Order as a "Tier 2 Ordinary Course Professional." Pursuant to the OCP Order, Tier 2 Ordinary Course Professionals are subject to a cap of \$50,000 in monthly fees and expenses on average over a rolling three month period.

3. Gordon Rees filed a Declaration in Support of Employment of Gordon Rees Scully Mansukhani, LLP as Professional Utilized in the Ordinary Course of Business on October 6, 2023 [Docket No. 481] (the "OCP Declaration"). No objections were filed to the OCP Declaration.

4. Gordon Rees's fees and expenses are anticipated to exceed the cap for Tier 2 Ordinary Course Professionals as set forth in the OCP Order.

5. During the one-year period prior to the commencement of these Chapter 11 Cases, Gordon Rees has received \$25,465.00, consisting of \$25,465.00 of professional fees and \$0.00 of reimbursed expenses, from the Debtors for professional fees and expenses incurred prior to the Petition Date. Of these payments, \$25,465.00 was received in the 90 days immediately preceding the Petition Date. As of the Petition Date, the Debtors owed Gordon Rees \$0.00 for services invoiced, consisting of \$0.00 of unpaid professional fees and \$0.00 of unpaid expenses.

6. Between the Petition Date and the Effective Date, Gordon Rees has received \$0.00, consisting of \$0.00 of professional fees and \$0.00 of reimbursed expenses, from the Debtors for professional fees and expenses incurred between the Petition Date and the Effective Date.

7. Gordon Rees will seek approval of payment of compensation upon the filing of appropriate applications for allowance of interim or final compensation pursuant to sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and orders of this Court.

8. The services to be rendered include all those services set forth in the Application.

9. Gordon Rees further states that it has neither shared nor agreed to share: (a) any compensation it has received or may receive with another party or person, other than with the partners, counsel, and associates of Gordon Rees; or (b) any compensation another person or party has received or may receive.

Dated: November 20, 2023

**GORDON REES SCULLY
MANSUKHANI, LLP**

/s/ Clair E. Wischusen

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and Debtors in Possession*